

# Exhibit K

DR. WILLIAM LONGO, on 04/21/2021

CHRISTINA G. PRUDENCIO vs. JOHNSON &amp; JOHNSON, et al.

Page 1

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR

2 THE COUNTY OF ALAMEDA

3 CHRISTINA G. PRUDENCIO, )  
4 )  
5 Plaintiff, )  
6 )  
7 vs. ) Case No.  
8 ) RG20061303

JOHNSON & JOHNSON; JOHNSON )  
& JOHNSON CONSUMER, INC. )  
(Sued individually and as )  
successor-in-interest to )  
JOHNSON & JOHNSON CONSUMER )  
COMPANIES, INC.), et al., )

10 Defendants. )

Certified Transcript

11 ) (Pages 1 - 228)

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14

DEPOSITION OF EXPERT WITNESS

15

DR. WILLIAM LONGO

16

WEDNESDAY, APRIL 21, 2021

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Reported by: KAREN C. WATERS, REGISTERED

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PROFESSIONAL REPORTER

DR. WILLIAM LONGO, on 04/21/2021

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11 (Sued individually and as )  
12 successor-in-interest to )  
13 JOHNSON & JOHNSON CONSUMER )  
14 COMPANIES, INC.), et al., )  
15 )  
16 Defendants. )  
17 \_\_\_\_\_ )  
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19 )  
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23 )  
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DEPOSITION OF DR. WILLIAM LONGO, taken on

behalf of Defendants, remotely via

videoconference, commencing at 9:05 a.m. (PST),

Wednesday, April 21, 2021, before Karen C.

Waters, Registered Professional Reporter.

DR. WILLIAM LONGO, on 04/21/2021

CHRISTINA G. PRUDENCIO vs. JOHNSON &amp; JOHNSON, et al.

Page 3

1 APPEARANCES: (Via videoconference) :

2  
3 For Plaintiff:4 KAZAN, MCCLAIN, SATTERLEY & GREENWOOD  
5 BY: IAN A. RIVAMONTE, ESQ.  
6 Jack London Market,  
7 55 Harrison Street  
8 Suite 400  
9 Oakland, California 94607  
10 (510) 302-1000  
11 irivamonte@kazanlaw.com12 For Defendants LONGS DRUG STORES CALIFORNIA,  
13 L.L.C., on behalf of LONGS DRUG STORES  
14 CALIFORNIA, INC. (Erroneously sued as LONGS DRUG  
15 STORES CALIFORNIA, L.L.C., individually and as  
16 successor-in-interest, parent, alter ego, and  
17 equitable trustee of LONGS DRUG STORES  
18 CALIFORNIA, INC.); SAFEWAY INC.; LUCKY STORES,  
19 INC.; and ALBERTSONS COMPANIES, INC.:20 BARNES & THORNBURG LLP  
21 BY: MITCHELL R. CHARHALIS, ESQ.  
22 2029 Century Park East  
23 Suite 300  
24 Los Angeles, California 90067  
25 (310) 284-3768  
mcharhalis@btlaw.com26 For Defendants JOHNSON & JOHNSON and JOHNSON &  
27 JOHNSON CONSUMER INC.:28 KING & SPALDING LLP  
29 BY: KEVIN HYNES, ESQ.  
30 1185 Avenue of the Americas  
31 34th Floor  
32 New York, New York 10036  
33 (212) 790-5349  
34 khynes@kslaw.com

DR. WILLIAM LONGO, on 04/21/2021

CHRISTINA G. PRUDENCIO vs. JOHNSON &amp; JOHNSON, et al.

Page 4

1 APPEARANCE (Via videoconference) (continued) :

2

3 For Defendant PERRIGO COMPANY OF TENNESSEE:

4 GOODELL, DEVRIES, LEECH & DANN, LLP  
5 BY: JEFFREY J. HINES, ESQ.  
6 One South Street  
7 20th Floor  
Baltimore, Maryland 21202  
(410) 783-4041  
jjh@gdldlaw.com

8

9 For Defendant VI-HON, INC.:

10 REED SMITH LLP  
11 BY: SHANA E. RUSSO, ESQ.  
506 Carnegie Center  
12 Suite 300  
Princeton, New Jersey 08540-7839  
(609) 987-0050  
13 srucco@reedsmitth.com

14

15 Also Present:

16 Bret Hampton, the videographer.

DR. WILLIAM LONGO, on 04/21/2021

CHRISTINA G. PRUDENCIO vs. JOHNSON &amp; JOHNSON, et al.

Page 26

1       ISO PLM method. Sample preparation for the  
2       heavy liquid density is not the ISO method, but  
3       that's what I -- what we had been calling the  
4       CSM method.

5       **Q. Okay.**

6       A. So it's two different things. There's  
7       sample prep, but then there's the analysis to  
8       determine if chrysotile is present.

9       **Q. Right. So that analysis follows the ISO**  
10      **22262-1 methodology?**

11      A. Yes.

12      **Q. And Paul Hess, he was the individual who**  
13      **performed all of the PLM analyses as part of**  
14      **this report that was marked as 3F as well as the**  
15      **part that was marked as 3G?**

16      A. Yes.

17      **Q. Okay. And I guess as part of this**  
18      **report, 3F, Mr. Hess identified what he**  
19      **identified as chrysotile at levels varying**  
20      **from -- without the liquid separation**  
21      **technique -- levels from .006 to .009 area**  
22      **percent weight, correct?**

23      A. I believe that's correct. I know you're  
24      just reading it off the results, but I always  
25      feel silly if I agree and then it's not. That

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Page 228

1 die.)

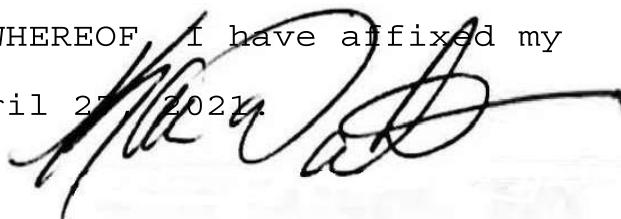
## 2 REPORTER'S CERTIFICATE

3 I, KAREN WATERS, Registered Professional  
4 Reporter, do hereby certify that previous to the  
5 commencement of the examination, the said  
6 DR. WILLIAM LONGO, was duly sworn by me to  
7 testify to the truth in relation to the matters  
8 in controversy between the parties hereto; that  
9 the said deposition was taken in machine  
10 shorthand by me at the time and place aforesaid  
11 and was thereafter reduced to typewritten form;  
12 that the foregoing is a true transcript of the  
13 questions asked, testimony given, and  
14 proceedings had.

15 I further certify that I am not employed  
16 by, related to, nor of counsel for any of the  
17 parties herein, nor otherwise interested in the  
18 outcome of this litigation.

19 IN WITNESS WHEREOF I have affixed my

20 Signature this April 27, 2021



21 Karen Waters

22 \_\_\_\_\_ Reading and Signing was requested.

23  Reading and Signing was waived.

24 \_\_\_\_\_ Reading and Signing is not required.